



March 16, 2012

RE: IB Docket No. 11-109; Comment on NTIA Letter Regarding LightSquared Conditional Waiver

Dear Chairman Genachowski:

The Aerospace Industries Association (AIA) supports the Federal Communications Commission's (FCC) decision regarding LightSquared Subsidiary LLC's (LightSquared) request for authority to operate. Specifically, AIA supports the FCC's proposed actions as stated in IB Docket Number 11-109:

1. Vacatur of the *Conditional Waiver Order*, which is currently the subject of petitions for reconsideration, due to LightSquared's inability to address satisfactorily the legitimate interference concerns surrounding its planned terrestrial operations, and the appearance that the Interference Resolution Process has no realistic prospect of being successfully completed by LightSquared in a reasonable period of time, and
2. Modification of LightSquared's satellite license pursuant to Section 316 of the Communications Act to suspend indefinitely LightSquared's underlying ATC authorization, first granted in 2004, to an extent consistent with the NTIA Letter of February 14, 2012.

AIA and its member companies support expanded, affordable wireless broadband coverage for America and efficient use of spectrum resources. In fact, our member companies are hard at work finding solutions to provide in-flight broadband to passengers to increase their productivity and overall in-flight experience.

AIA's member companies have worked with FAA, the National Telecommunications and Information Administration, and LightSquared to address the concerns of global positioning satellite (GPS) equipment manufacturers, and end-users. While we acknowledge that the current generation of GPS receivers may be highly susceptible to interference, there is no question that American commerce, national security, scientific missions and safety services rightly depend on this reliable product.

GPS will be a key element of future aviation systems, providing precise aircraft positioning information to pilots and air traffic personnel for airspace management. Beyond GPS receivers used for navigation, GPS is used as a precision timing standard for many critical applications including terrestrial cellular (wireless) networks.

In light of the considerable time and financial resources that all parties have expended on this issue and with a focus on future policies, we support drafting new GPS spectrum interference standards that will help inform future proposals for non-space, commercial uses in the bands adjacent to the GPS signals and ensure that any such proposals are implemented without affecting existing and evolving uses of critical space-based PNT services. While there are clear lessons learned from this proceeding, AIA and

its members encourage the FCC to continue to examine innovative broadband solutions based on the unique merits of each proposal. For example, the FCC should continue to examine how satellites can be used as a means of providing or extending broadband access to hundreds of millions of Americans, including those in underserved and unserved areas.

We thank the FCC for its consideration of our concerns. Please know that AIA and its member companies look forward to working with the FCC to explore these bands for GPS-compatible use and to ensure that American infrastructure, security, and overall quality of life continue to improve by means of sound spectrum allocation policies and decisions.

Sincerely,

A handwritten signature in black ink, appearing to read 'DK Elwell', written in a cursive style.

Daniel K. Elwell

Vice-president, Civil Aviation